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September 9, 2016

VIA ECF

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street New York  
New York 10007

**Re: Bradley v. Kadmon Pharmaceuticals, LLC, Case No. 1:16-cv-5678 (LGS)**

Dear Judge Schofield:

This firm represents defendant Kadmon Pharmaceuticals, LLC (“Kadmon”), in the above-referenced matter. This letter is submitted jointly on behalf of all parties to this action to respectfully request that the Court adjourn the Initial Pre-Trial Conference, presently scheduled for September 15, 2016 (ECF No. 6), and the date for submission of a joint status letter (ECF No. 7), and to further extend Kadmon’s time to answer, move or otherwise respond to the Mr. Bradley’s Complaint until October 21, 2016.

Presently, the parties are engaged in discussions in an attempt to finally resolve this matter without Court intervention and we believe such will be accomplished in short order. However, should resolution prove unobtainable, Kadmon intends to move to dismiss the action in its entirety for, *inter alia*, lack of personal jurisdiction, as Kadmon has not yet responded to Mr. Bradley’s Complaint (and is not required to do so until September 19, 2016, after the presently scheduled Initial Pre-Trial Conference). Given the foregoing, the parties respectfully request that the Initial Pre-Trial Conference and the date for submission of a joint status letter be adjourned, and Kadmon’s time to answer, move or otherwise response to the Complaint be extended until October 21, 2016, so as to allow the parties an opportunity to finally resolve this matter without forcing either them or the Court to expend time and resources on motion practice and other matters which likely will become moot.

We thank Your Honor for your attention in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Garrett D. Kennedy', written over a horizontal line.

Garrett D. Kennedy

cc: Paul Liggieri, Esq. (counsel for plaintiff)